

CHRISTIAN MORRIS TRIAL ATTORNEYS

2250 Corporate Circle, Suite. 390
Henderson, Nevada 89074
702-434.8282 / 702-434.1488 (fax)

CHRISTIAN M. MORRIS, ESQ.
Nevada Bar No. 11218
VICTORIA R. ALLEN, ESQ.
Nevada Bar No. 15005
CHRISTIAN MORRIS TRIAL ATTORNEYS
2250 Corporate Circle, Suite 390
Henderson, Nevada 89074
T: (702) 434-8282
F: (702) 434-1488
christian@CMTrialAttorneys.com
victoria@CMTrialAttorneys.com
-and-
JOSEPH CAMMARATA, ESQ. (*pro hac vice*)
IRA SHERMAN, ESQ. (*pro hac vice*)
STEPHEN P. OLLAR, ESQ. (*pro hac vice*)
CHAIKIN, SHERMAN, CAMMARATA & SIEGEL, P.C.
1232 Seventeenth Street, N.W.
Washington, DC 20036
(202) 659-8600
Fax: (202) 659-8680
Joe@dc-law.net
Sherman@dc-law.net
Ollar@dc-law.net
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THERESE PICKING SERIGNESE, an
individual,

Plaintiff,

vs.

WILLIAM H. COSBY, JR., an individual;
DOES 1 through 10, inclusive; and ROE
Corporations 11-20, inclusive,

Defendants.

CASE NO.: 2:24-cv-00794

**JOINT STIPULATION AND ORDER TO
STAY DISCOVERY**

COMES NOW, Plaintiff Therese Picking Serignese, by and through her attorneys,
Christian M. Morris, Esq., and Victoria R. Allen, Esq., of CHRISTIAN MORRIS TRIAL

1 ATTORNEYS, and Joseph Cammarata, Esq., Ira Sherman, Esq., and Stephen P. Ollar, Esq., of
2 CHAIKIN, SHERMAN, CAMMARATA & SIEGEL, P.C., and Defendant William H. Cosby, Jr.,
3 by and through his attorneys, Nicholas M. Wooldridge, Esq. of WOOLDRIDGE LAW LTD and
4 Jennifer Bonjean, Esq., Ashley Cohen, Esq., and Gabriella Orozco, Esq. of BONJEAN LAW
5 GROUP, PLLC and hereby submits this Stipulation and Order to Stay Discovery.

6 IT IS HEREBY STIPULATED AND AGREED between the parties as to the following:

7 A stay of discovery is necessary as Defendant filed a Notice of Removal to Federal Court
8 on April 24, 2024. On May 24, 2024 Plaintiff filed a Motion to Remand back to State Court.
9 Defendant filed an Opposition to Plaintiff's Motion to Remand on June 7, 2024. Plaintiff's Reply
10 to the Motion is due on June 14, 2024. The hearing on said Motion is scheduled to be heard on
11 July 8, 2024 at 10:00 a.m.

12 Typical situations in which a discovery stay is appropriate includes motions that raise
13 issues of jurisdiction, venue, or immunity. *Id.* Further, "[a] situation that in and of itself would
14 warrant a stay of discovery...occur[s] when jurisdiction, venue, or immunity are preliminary
15 issues. *Twin City Fire Ins. Co. v. Employers Ins. of Wausau*, 124 F.R.D. 652, 654 (D.Nev.1989).

16 Here, Plaintiff contends that this Court lacks subject matter jurisdiction and that this case
17 is better heard in the Eighth Judicial District court. On the contrary, it is Defendant Cosby's
18 position that this court has subject matter jurisdiction over this matter and this matter should remain
19 in this court.

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

CHRISTIAN MORRIS TRIAL ATTORNEYS

2250 Corporate Circle, Suite. 390
Henderson, Nevada 89074
702-434.8282 / 702-434.1488 (fax)

Accordingly, the parties agree that discovery, including the filing of a joint discovery plan pursuant to F.R.C.P. 26(f), should be stayed pending a decision on Plaintiff's Motion to Remand.

DATED this 10th day of June 2024.

/s/ Victoria R. Allen, Esq.

CHRISTIAN MORRIS TRIAL ATTORNEYS
CHRISTIAN M. MORRIS, ESQ.

Nevada Bar No. 11218

VICTORIA R. ALLEN, ESQ.

Nevada Bar No. 15005

2250 Corporate Circle, Suite 390

Henderson, Nevada 89074

-and-

JOSEPH CAMMARATA (*pro hac vice*)

IRA SHERMAN (*pro hac vice*)

STEPHEN P. OLLAR, ESQ (*pro hac vice*)

CHAIKIN, SHERMAN, CAMMARATA &
SIEGEL, P.C.

1232 Seventeenth Street, N.W.

Washington, DC 20036

Attorneys for Plaintiff

DATED this 10th day of June 2024.

/s/ Jennifer Bonjean, Esq.

NICHOLAS WOOLDRIDGE ESQ.

WOOLDRIDGE LAW LTD.

400 S. 7TH Street, Suite 400

Las Vegas, Nevada 89101

and

JENNIFER BONJEAN, ESQ. (*Pro Hac Vice*)

BONJEAN LAW GROUP, PLLC.

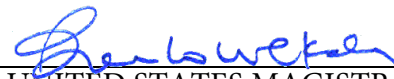
303 Van Brunt Street, 1st Floor

Brooklyn, NY 11231

Attorneys for Defendant

ORDER

IT IS SO ORDERED that all discovery, including the filing of a joint discovery plan pursuant to F.R.C.P. 26(f), will be stayed until the decision on the Motion to Remand is entered.



UNITED STATES MAGISTRATE JUDGE

DATED: June 11, 2024

CHRISTIAN MORRIS TRIAL ATTORNEYS

2250 Corporate Circle, Suite. 390
Henderson, Nevada 89074
702-434.8282 / 702-434.1488 (fax)

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of June 2024, I electronically filed the foregoing **JOINT STIPULATION AND ORDER TO STAY DISCOVERY** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted in the Electronic Mail Notice List as listed below:

Nicholas Wooldridge Esq.
WOOLDRIDGE LAW LTD.
400 S. 7TH Street, Suite 400
Las Vegas, Nevada 89101
Tel. (702) 623-6362
nicholas@wooldridgelawlv.com

JENNIFER BONJEAN- Pro Hac Vice
Bonjean Law Group, PLLC.
303 Van Brunt Street, 1st Floor
Brooklyn, NY 11231
Telephone: (718) 875-1850
Facsimile: (914) 462-3482
jennifer@bonjeanlaw.com
Attorneys for Defendant

/s/ Thomas Dudley

An employee of
CHRISTIAN MORRIS TRIAL ATTORNEYS

From: [Gabriella Orozco](#)
To: [Tori Allen](#); [Jennifer Bonjean](#); [Joe Cammarata](#)
Cc: [Christian Morris](#); [Ashley Cohen](#); [melody@wooldridgelawlv.com](#); [nancy@wooldridgelawlv.com](#); [Reyna Quintana](#); [Thomas Dudley](#); [Tiffany Pond](#); [Nicholas Wooldridge](#); [Ira Sherman](#); [Stephen P. Ollar](#); [Caroline Gimello](#); [Haley Coolbaugh](#)
Subject: Re: Serignese v. Cosby - Meeting to discuss Joint Status Report/ IGNORE POTENTIAL CHANGE IN TIME
Date: Monday, June 10, 2024 5:41:22 PM
Attachments: [image001.png](#)
[image002.png](#)
[2024.06.10 - JSR Serignese.docx](#)

See attached edits. I spoke with Jennifer and she approved the edits. You may put her signature. Thanks all

Gabriella Orozco, Esq.

Bonjean Law Group PLLC

PLEASE NOTE NEW ADDRESS:

303 Van Brunt, 1st Fl

Brooklyn, New York 11231

Tel: 718.875.1850

Fax: 914.463.3483

Email: Gabriella@bonjeanlaw.com

Chicago Office:

Bonjean Law Group, PLLC

53 W. Jackson, Blvd., Ste. 315

Chicago, Illinois 60604

CONFIDENTIALITY NOTICE:

The contents of this email message and any attachments are intended solely for the addressee(s) and may contain confidential and/or privileged information and may be legally protected from disclosure. If you are not the intended recipient of this message or their agent, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments. If you are not the intended recipient, you are hereby notified that any use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.

From: Tori Allen <Victoria@CMTrialAttorneys.com>

Date: Monday, June 10, 2024 at 7:48 PM

To: Jennifer Bonjean <jennifer@bonjeanlaw.com>, Joe Cammarata <joe@dc-law.net>

Cc: Gabriella Orozco <Gabriella@bonjeanlaw.com>, Christian Morris

<Christian@CMTrialAttorneys.com>, Ashley Cohen <ashley@bonjeanlaw.com>,

[melody@wooldridgelawlv.com](#) <[melody@wooldridgelawlv.com](#)>,

[nancy@wooldridgelawlv.com](#) <[nancy@wooldridgelawlv.com](#)>, Reyna Quintana

<[reyna@wooldridgelawlv.com](#)>, Thomas Dudley <[Thomas@CMTrialAttorneys.com](#)>,

Tiffany Pond <[tiffany@CMTrialAttorneys.com](#)>, Nicholas Wooldridge

<[nicholas@wooldridgelawlv.com](#)>, Ira Sherman <[sherman@dc-law.net](#)>, Stephen P.

Ollar <[ollar@dc-law.net](#)>, Caroline Gimello <[Caroline@dc-law.net](#)>, Haley Coolbaugh

<[Haley@bonjeanlaw.com](#)>

Subject: RE: Serignese v. Cosby - Meeting to discuss Joint Status Report/ IGNORE POTENTIAL CHANGE IN TIME

Counsel,

Following up on the draft attached. Please advise on any changes or if we can affix your e-signature as soon as possible so we may submit to the court today.

Warm regards,



TORI R. ALLEN, ESQ.

Attorney

Office Phone: 702.434.8282
2250 Corporate Circle, Suite 390
Henderson, NV 89074



This email may contain CONFIDENTIAL AND/OR LEGALLY PRIVILEGED INFORMATION intended only for the use of the intended recipients identified above. If you are not the intended recipient of this email, you are hereby notified that any unauthorized review, use, dissemination, distribution, downloading, or copying of this communication is strictly prohibited. If you are not the intended recipient and have received this communication in error, please immediately notify us by reply email, delete the communication and destroy all copies.

From: Tori Allen

Sent: Monday, June 10, 2024 12:59 PM

To: Jennifer Bonjean <jennifer@bonjeanlaw.com>; Joe Cammarata <joe@dc-law.net>

Cc: Gabriella Orozco <Gabriella@bonjeanlaw.com>; Christian Morris <Christian@CMTrialAttorneys.com>; Ashley Cohen <ashley@bonjeanlaw.com>; melody@wooldridgelawlv.com; nancy@wooldridgelawlv.com; Reyna Quintana <reyna@wooldridgelawlv.com>; Thomas Dudley <Thomas@CMTrialAttorneys.com>; Tiffany Pond <tiffanyp@CMTrialAttorneys.com>; Nicholas Wooldridge <nicholas@wooldridgelawlv.com>; Ira Sherman <sherman@dc-law.net>; Stephen P. Ollar <ollar@dc-law.net>; Caroline Gimello <Caroline@dc-law.net>; Haley Coolbaugh <Haley@bonjeanlaw.com>

Subject: RE: Serignese v. Cosby - Meeting to discuss Joint Status Report/ IGNORE POTENTIAL CHANGE IN TIME

Please see the attached proposed stipulation and order to stay discovery. Please advise if you have any proposed changes or if we may affix your e-signature and submit.

Warm regards,

|



TORI R. ALLEN, ESQ.

Attorney

Office Phone: 702.434.8282
2250 Corporate Circle, Suite 390
Henderson, NV 89074



This email may contain CONFIDENTIAL AND/OR LEGALLY PRIVILEGED INFORMATION intended only for the use of the intended recipients identified above. If you are not the intended recipient of this email, you are hereby notified that any unauthorized review, use, dissemination, distribution, downloading, or copying of this communication is strictly prohibited. If you are not the intended recipient and have received this communication in error, please immediately notify us by reply email, delete the communication and destroy all copies.

From: Jennifer Bonjean <jennifer@bonjeanlaw.com>

Sent: Monday, June 10, 2024 11:15 AM

To: Joe Cammarata <joe@dc-law.net>

Cc: Gabriella Orozco <Gabriella@bonjeanlaw.com>; Christian Morris <Christian@CMTrialAttorneys.com>; Ashley Cohen <ashley@bonjeanlaw.com>; melody@wooldridgelawlv.com; nancy@wooldridgelawlv.com; Reyna Quintana <reyna@wooldridgelawlv.com>; Tori Allen <Victoria@CMTrialAttorneys.com>; Thomas Dudley <Thomas@CMTrialAttorneys.com>; Tiffany Pond <tiffanyp@CMTrialAttorneys.com>; Nicholas Wooldridge <nicholas@wooldridgelawlv.com>; Ira Sherman <sherman@dc-law.net>; Stephen P. Ollar <ollar@dc-law.net>; Caroline Gimello <Caroline@dc-law.net>; Haley Coolbaugh <Haley@bonjeanlaw.com>

Subject: Re: Serignese v. Cosby - Meeting to discuss Joint Status Report/ IGNORE POTENTIAL CHANGE IN TIME

As the Plaintiff who has the motion pending, it makes more sense for you to propose something. Thanks.
Sincerely,

Jennifer Bonjean, Esq.

Bonjean Law Group PLLC
750 Lexington Avenue, 9th Floor
New York, New York 10022
Tel: 718.875.1850
Fax: 914.462.3482
Email: Jennifer@bonjeanlaw.com

Chicago Office

Bonjean Law Group PLLC
53 W. Jackson Blvd., Suite 315
Chicago, Illinois 60604

CONFIDENTIALITY NOTICE:

The contents of this email message and any attachments are intended solely for the addressee(s) and may contain confidential and/or privileged information and may be legally protected from disclosure. If you are not the intended recipient of this message or their agent, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments. If you are not the intended recipient, you are hereby notified that any use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.

On Jun 10, 2024, at 1:36 PM, Joe Cammarata <joe@dc-law.net> wrote:

We agree. Would you please draft a Stipulation staying discovery and an Order? Please let me know.

Thanks.

<image001.jpg>

<image002.png>

<image003.jpg>

<image004.png>

<image005.png>

<image006.png>

<image007.jpg>

<image008.png>

From: Jennifer Bonjean <jennifer@bonjeanlaw.com>

Sent: Sunday, June 9, 2024 8:35 PM

To: Gabriella Orozco <Gabriella@bonjeanlaw.com>; Joe Cammarata <joe@dc-law.net>; Christian Morris <christian@CMTrialAttorneys.com>

Cc: Ashley Cohen <ashley@bonjeanlaw.com>; melody@wooldridgelawlv.com; nancy@wooldridgelawlv.com; Reyna Quintana <reyna@wooldridgelawlv.com>; victoria@CMTrialAttorneys.com; Thomas@CMTrialAttorneys.com; tiffany@CMTrialAttorneys.com; Nicholas Wooldridge

<nicholas@wooldridgelawlv.com>; Ira Sherman <sherman@dc-law.net>; Stephen P. Ollar <ollar@dc-law.net>; Caroline Gimello <Caroline@dc-law.net>; Haley Coolbaugh

<Haley@bonjeanlaw.com>

Subject: Re: Serignese v. Cosby - Meeting to discuss Joint Status Report/ IGNORE
POTENTIAL CHANGE IN TIME

Our position is that given Plaintiff's pending motion, the fact that Defendant has not answered or otherwise pled in response to the Complaint, it makes sense to let the Court know that a discovery plane is premature but we will await your position on the issue.

Sincerely,

Jennifer Bonjean, Esq.

Bonjean Law Group PLLC
750 Lexington Avenue, 9th Floor
New York, New York 10022
Tel: 718.875.1850
Fax: 914.462.3483
Email: Jennifer@bonjeanlaw.com

Chicago Office

Bonjean Law Group PLLC
53 W. Jackson Blvd, Suite 315
Chicago, Illinois 60604

CONFIDENTIALITY NOTICE:

The contents of this email message and any attachments are intended solely for the addressee(s) and may contain confidential and/or privileged information and may be legally protected from disclosure. If you are not the intended recipient of this message or their agent, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments. If you are not the intended recipient, you are hereby notified that any use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.

From: Gabriella Orozco <Gabriella@bonjeanlaw.com>

Date: Sunday, June 9, 2024 at 7:40 PM

To: Joe Cammarata <joe@dc-law.net>, Christian Morris
<christian@CMTrialAttorneys.com>

Cc: Ashley Cohen <ashley@bonjeanlaw.com>,
melody@wooldridgelawlv.com <melody@wooldridgelawlv.com>,
nancy@wooldridgelawlv.com <nancy@wooldridgelawlv.com>, Reyna
Quintana <reyna@wooldridgelawlv.com>, victoria@CMTrialAttorneys.com
<victoria@CMTrialAttorneys.com>, Thomas@CMTrialAttorneys.com
<Thomas@CMTrialAttorneys.com>, tiffanyp@CMTrialAttorneys.com
<tiffanyp@CMTrialAttorneys.com>, Nicholas Wooldridge

<nicholas@wooldridgelawlv.com>, Ira Sherman <sherman@dc-law.net>,
Stephen P. Ollar <ollar@dc-law.net>, Jennifer Bonjean
<jennifer@bonjeanlaw.com>, Caroline Gimello <Caroline@dc-law.net>,
Haley Coolbaugh <Haley@bonjeanlaw.com>

Subject: Re: Serignese v. Cosby - Meeting to discuss Joint Status Report/
IGNORE POTENTIAL CHANGE IN TIME

Counsel,

As I'm sure you're aware, the discovery plan is due in this case tomorrow.
Please forward your draft to us early enough tomorrow so we may review
prior to filing. Thank you.

Gabriella Orozco, Esq.

Bonjean Law Group PLLC

PLEASE NOTE NEW ADDRESS:

303 Van Brunt, 1st Fl

Brooklyn, New York 11231

Tel: 718.875.1850

Fax: 914.463.3483

Email: Gabriella@bonjeanlaw.com

Chicago Office:

Bonjean Law Group, PLLC

53 W. Jackson, Blvd., Ste. 315

Chicago, Illinois 60604

CONFIDENTIALITY NOTICE:

The contents of this email message and any attachments are intended solely for the
addressee(s) and may contain confidential and/or privileged information and may be
legally protected from disclosure. If you are not the intended recipient of this message or their
agent, or if this message has been addressed to you in error, please immediately alert the
sender by reply email and then delete this message and any attachments. If you are not
the intended recipient, you are hereby notified that any use, dissemination, copying, or storage
of this message or its attachments is strictly prohibited.

From: Joe Cammarata <joe@dc-law.net>

Date: Tuesday, May 28, 2024 at 9:22 AM

To: Haley Coolbaugh <Haley@bonjeanlaw.com>, Gabriella Orozco
<Gabriella@bonjeanlaw.com>

Cc: Ashley Cohen <ashley@bonjeanlaw.com>, Nicholas Wooldridge
<nicholas@wooldridgelawlv.com>, melody@wooldridgelawlv.com
<melody@wooldridgelawlv.com>, nancy@wooldridgelawlv.com
<nancy@wooldridgelawlv.com>, Reyna Quintana
<reyna@wooldridgelawlv.com>, victoria@CMTrialAttorneys.com
<victoria@CMTrialAttorneys.com>, Thomas@CMTrialAttorneys.com

<Thomas@CMTrialAttorneys.com>, Christian Morris
<christian@CMTrialAttorneys.com>, tiffany@CMTrialAttorneys.com
<tiffany@CMTrialAttorneys.com>, Ira Sherman <sherman@dc-law.net>,
Stephen P. Ollar <ollar@dc-law.net>, Jennifer Bonjean
<jennifer@bonjeanlaw.com>, Caroline Gimello <Caroline@dc-law.net>
Subject: RE: Serignese v. Cosby - Meeting to discuss Joint Status Report/
IGNORE POTENTIAL CHANGE IN TIME

PLEASE IGNORE THE EARLIER REQUEST TO CHANGE THE
TIME FOR OUR TELEPHONE CONFERENCE FROM 12PM
EST TODAY. WE WILL LEAVE THE CONFERENCE AS
PREVIOUSLY SCHEDULED.

<image001.jpg>

<image002.png>

<image003.jpg>

<image004.png>

<image005.png>

<image006.png>

<image007.jpg>

<image008.png>

From: Joe Cammarata

Sent: Monday, May 27, 2024 2:32 PM

To: 'Haley Coolbaugh' <Haley@bonjeanlaw.com>; Gabriella Orozco
<Gabriella@bonjeanlaw.com>

Cc: Ashley Cohen <ashley@bonjeanlaw.com>; Nicholas Wooldridge
<nicholas@wooldridgelawlv.com>; melody@wooldridgelawlv.com;
nancy@wooldridgelawlv.com; Reyna Quintana <reyna@wooldridgelawlv.com>;
victoria@CMTrialAttorneys.com; Thomas@CMTrialAttorneys.com; Christian Morris
<christian@CMTrialAttorneys.com>; tiffany@CMTrialAttorneys.com; Ira Sherman
<sherman@dc-law.net>; Stephen P. Ollar <ollar@dc-law.net>; Jennifer Bonjean
<jennifer@bonjeanlaw.com>; Caroline Gimello <Caroline@dc-law.net>

Subject: RE: Serignese v. Cosby - Meeting to discuss Joint Status Report/POTENTIAL CHANGE IN TIME

Good afternoon,

Something has come up on an emergent basis which will take me out of pocket from 11-2pm EST. Is there any chance we can move our telephone conference to 2pm EST?

Please let me know.

Thanks,

Joe

<image001.jpg>

<image002.png>

<image003.jpg>

<image004.png>

<image005.png>

<image006.png>

<image007.jpg>

<image008.png>

From: Haley Coolbaugh <Haley@bonjeanlaw.com>

Sent: Friday, May 24, 2024 1:35 PM

To: Joe Cammarata <joe@dc-law.net>; Gabriella Orozco <Gabriella@bonjeanlaw.com>

Cc: Ashley Cohen <ashley@bonjeanlaw.com>; Nicholas Wooldridge <nicholas@wooldridgelawlv.com>; melody@wooldridgelawlv.com; nancy@wooldridgelawlv.com; Reyna Quintana <reyna@wooldridgelawlv.com>; victoria@CMTrialAttorneys.com; Thomas@CMTrialAttorneys.com; Christian Morris <christian@CMTrialAttorneys.com>; tiffanyp@CMTrialAttorneys.com; Ira Sherman <sherman@dc-law.net>; Stephen P. Ollar <ollar@dc-law.net>; Jennifer Bonjean <jennifer@bonjeanlaw.com>; Joe Cammarata <joe@dc-law.net>; Caroline Gimello <Caroline@dc-law.net>

Subject: Re: Serignese v. Cosby - Meeting to discuss Joint Status Report

Counsel:

Enclosed please find our conference line information that will be utilized for the meet and confer on 5/28 at 12EST. Thank you.

Dial: 917-962-0650

Code: 893201

Sincerely,

Haley Coolbaugh

Bonjean Law Group, PLLC
750 Lexington Avenue, 9th Floor
New York, New York 10022
Tel: 718.875.1850
Fax: 914.462.3483
Email: Haley@bonjeanlaw.com

Chicago Office:

Bonjean Law Group, PLLC
53 W. Jackson, Blvd., Ste. 315
Chicago, Illinois 60604

CONFIDENTIALITY NOTICE:

The contents of this email message and any attachments are intended solely for the addressee(s) and may contain confidential and/or privileged information and may be legally protected from disclosure. If you are not the intended recipient of this message or their agent, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments. If you are not the intended recipient, you are hereby notified that any use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.

From: Joe Cammarata <joe@dc-law.net>

Date: Friday, May 24, 2024 at 1:15 PM

To: Gabriella Orozco <Gabriella@bonjeanlaw.com>

Cc: Ashley Cohen <ashley@bonjeanlaw.com>, Nicholas Wooldridge <nicholas@wooldridgelawlv.com>, melody@wooldridgelawlv.com <melody@wooldridgelawlv.com>, nancy@wooldridgelawlv.com <nancy@wooldridgelawlv.com>, Reyna Quintana <reyna@wooldridgelawlv.com>, victoria@CMTrialAttorneys.com

<victoria@CMTrialAttorneys.com>, Thomas@CMTrialAttorneys.com
<Thomas@CMTrialAttorneys.com>, Christian Morris
<christian@CMTrialAttorneys.com>, tiffany@CMTrialAttorneys.com
<tiffany@CMTrialAttorneys.com>, Ira Sherman <Sherman@dc-law.net>,
Stephen P. Ollar <ollar@dc-law.net>, Haley Coolbaugh
<Haley@bonjeanlaw.com>, Jennifer Bonjean <jennifer@bonjeanlaw.com>,
Joe Cammarata <Joe@dc-law.net>, Caroline Gimello <Caroline@dc-law.net>

Subject: Re: Serignese v. Cosby - Meeting to discuss Joint Status Report

That will work for us.

Joseph Cammarata, Esq.
Chaikin, Sherman, Cammarata & Siegel, P.C.
1232 17th Street, N.W.
Washington, D.C. 20036
202-659-8600

Sent from my iPad

On May 24, 2024, at 12:43 PM, Gabriella Orozco
<Gabriella@bonjeanlaw.com> wrote:

Hi Thomas,

We can confer the 28th. How is noon EST?

Gabriella Orozco, Esq.
Bonjean Law Group PLLC
750 Lexington Avenue, 9th Floor
New York, New York 10022
Tel: 718.875.1850
Fax: 914.463.3483
Email: Gabriella@bonjeanlaw.com

Chicago Office:
Bonjean Law Group, PLLC
53 W. Jackson, Blvd., Ste. 315
Chicago, Illinois 60604

CONFIDENTIALITY NOTICE:

The contents of this email message and any attachments are intended solely for the addressee(s) and may contain confidential and/or privileged information and may be legally protected from disclosure. If you are not the intended recipient of this message or their agent, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments. If you are not the intended recipient, you are hereby notified that any use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.

From: Ashley Cohen <ashley@bonjeanlaw.com>

Date: Friday, May 24, 2024 at 12:30 PM

To: Haley Coolbaugh <Haley@bonjeanlaw.com>, Gabriella Orozco <Gabriella@bonjeanlaw.com>

Subject: FW: Serignese v. Cosby - Meeting to discuss Joint Status Report

Sincerely,

Ashley Cohen, Esq.
Bonjean Law Group PLLC
750 Lexington Avenue, 9th Floor
New York, New York 10022
Tel: 718.875.1850
Fax: 914.462.3483
Email: Ashley@bonjeanlaw.com

Chicago Office:
Bonjean Law Group, PLLC
53 W. Jackson Blvd., Ste. 315
Chicago, Illinois 60604

CONFIDENTIALITY NOTICE:

The contents of this email message and any attachments are intended solely for the addressee(s) and may contain confidential and/or privileged information and may be legally protected from disclosure. If you are not the intended recipient of this message or their agent, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments. If you are not the intended recipient, you are hereby notified that any use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.

From: Thomas Dudley <Thomas@CMTrialAttorneys.com>

Date: Friday, May 24, 2024 at 12:09 PM

To: nicholas@wooldridgelawlv.com
<nicholas@wooldridgelawlv.com>,
melody@wooldridgelawlv.com
<melody@wooldridgelawlv.com>, nancy@wooldridgelawlv.com
<nancy@wooldridgelawlv.com>, reyna@wooldridgelawlv.com
<reyna@wooldridgelawlv.com>, Ashley Cohen
<ashley@bonjeanlaw.com>, Jennifer Bonjean
<jennifer@bonjeanlaw.com>
Cc: Tori Allen <Victoria@CMTrialAttorneys.com>, Christian
Morris <Christian@CMTrialAttorneys.com>, Tiffany Pond
<tiffany@CMTrialAttorneys.com>, Joe Cammarata <joe@dc-law.net>,
Ira Sherman <sherman@dc-law.net>, Stephen P. Ollar
<ollar@dc-law.net>
Subject: Serignese v. Cosby - Meeting to discuss Joint Status
Report

Good morning,

Would counsel like to have a telephone conference today, May 24th
2024 or the morning of Tuesday, May 28th to discuss the Joint Status
Report which is due May 28th.

Thank you, Tom

Sincerely,
Thomas Dudley
Litigation Paralegal

<image009.jpg>
2250 Corporate Circle, Suite 390
Henderson, NV 89074
P. [\(702\) 434-8282](tel:(702)434-8282)
F. [\(702\) 434-1488](tel:(702)434-1488)
cmtrialattorneys.com
<image010.jpg>
<image011.png>